

EXHIBIT 1

DECLARATION OF JAMIE CROOKS, ESQ.

I, Jamie Crooks, declare under the penalty of perjury the following:

1. Declarant is an attorney duly licensed to practice in the District of Columbia and admitted *pro hac vice* to the District of Nevada to appear in *Alvarado v. Western Range Association*, No. 22-cv-249.

2. Declarant is Counsel for Plaintiff Cirilo Ucharima Alvarado in the instant matter.

3. WRA has asked this Court to take judicial notice of various filings from *Llacua v. Western Range et al.*, Case No. 15-CV-01889 (D. Colo.). As stated in his opposition brief, Plaintiff has no objection to this request as the *Llacua* filings and judicial decisions are matters of public record. Declarant additionally attaches the docket from *Llacua* for the Court's consideration. Exhibit 2 ("*Llacua* D. Colorado Docket"). Review of the docket shows that there was no class certified prior to the entry of judgment on the antitrust claims asserted against Western Range Association.

4. The Complaint in this case alleges that WRA is a California non-profit corporation with a principal place of business in Utah. *See* Compl. ¶ 27. Declarant realized this was based on outdated information when WRA filed a Certificate of Interested Parties on August 18, 2022 indicating that its principal place of business is "in Idaho, formerly Utah." *See* ECF No. 25. A member of Declarant's firm subsequently used the Idaho Secretary of State's online business search function to investigate the status of WRA's principal place of business. *See generally* Idaho Secretary of State's Office Business Search, *available at* <https://sosbiz.idaho.gov/search/business>. Records from the Idaho Secretary of State indicate that WRA's principal place of business changed from Utah to Idaho in December of 2015, *see* Exhibit 3 ("Statement of Change of Business Mailing Address," Dec. 8, 2015), and that Idaho remains its principal place of business, *see* Exhibit 4

(“Annual Report,” June 23, 2022). This means that WRA’s principal place of business at the time this lawsuit was filed was in Idaho, not Utah.

5. WRA identifies one Utah-based witness with testimony relevant to this case (former executive director Dennis Richins) in support of its argument that Utah is a more convenient forum than Nevada. But records from the Idaho Secretary of State indicate that Richins has not been the executive director of the WRA since 2014. *Compare* Exhibit 5 (“Annual Report Form,” addressed to Idaho Secretary of State, July 6, 2014) (listing Dennis Richins as “Executive Director”), *with* Exhibit 6 (“Annual Report Form,” addressed to Idaho Secretary of State, July 9, 2015) (listing Greg Heidemann as “Executive Director”). In fact, according to LinkedIn, Monica Youree has been the executive director of the WRA since approximately January 2017, and she is located in Twin Falls, Idaho. *See* Exhibit 7 (LinkedIn profile for Monica Youree).

6. Records from the Idaho Secretary of State further reveal that only one of WRA’s directors currently resides in Utah, and the majority reside in Nevada, California, and Idaho. *See* Exhibit 4.

Declarant further sayeth not.

DATED this 14th day of October, 2022.

/s Jamie Crooks
JAMIE CROOKS, ESQ.

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